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Attorneys for HFC Acceptance, LLC

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

-----X
In re Case No. 24-40151 (JMM)
ICR GROUP, LLC, Chapter 11
Debtor.

-----X

NOTICE OF DEFAULT OF ADEQUATE PROTECTION PAYMENT

DUE DATE: OCTOBER 1, 2024

HFC Acceptance, LLC, a secured creditor (“HFC”) of ICR Group, LLC, the debtor and debtor in possession (“Debtor”) in the above-captioned case (the “Case”), hereby provides notice of default (“AP Notice Default”) to: Debtor at kenny@ezrentacarny.com and isaacbirn@gmail.com, counsel for Debtor at rspence@spencelawpc.com, and the subchapter V trustee appointed in the Case at gluckman@forchellilaw.com (the “Notice Parties”).

NOTICE IS HEREBY GIVEN that HFC did not receive the adequate protection payment in the amount of \$25,000.00 that was to be paid by Debtor and received by HFC on October 1, 2024, pursuant to the Order Conditionally Granting Relief From the Automatic Stay (HFC Acceptance LLC) [Dkt. 49] entered by the Court on May 22, 2024 (the “AP Default”).

NOTICE IS FURTHER GIVEN that Debtor has 14 days from the date of the AP Default to cure the AP Default.

DATED: October 8, 2024

KLESTADT WINTERS JURELLER SOUTHARD
& STEVENS LLP

By: /s/ Tracy L. Klestadt
Tracy L Klestadt
Brendan M. Scott

BUCHALTER
A Professional Corporation

By: /s/ William S. Brody
William S. Brody
Brian T. Harvey
Erick D. Diaz

Attorneys for HFC ACCEPTANCE, LLC

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: Buchalter, A Professional Corporation, 1000 Wilshire Blvd., Suite 1500, Los Angeles, CA 90017

A true and correct copy of the foregoing document entitled (*specify*):

NOTICE OF DEFAULT OF ADEQUATE PROTECTION PAYMENT - DUE DATE: OCTOBER 1, 2024

will be served or was served in the manner stated below:

1. **SERVED BY UNITED STATES MAIL:** On October 8, 2024, I served the following persons and/or entities at the last known addresses by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows.

ICR Group LLC
199 Lee Avenue, Suite 675
Brooklyn, NY 11211

Robert J Spence
Spence Law Office, P.C.
55 Lumber Road, Suite 5
Roslyn, NY 11576

Gerard R Luckman, Esq.
Subchapter V Trustee
Forcelli Deegan Terrana, LLP
333 Earle Ovington Blvd., Suite 1010
Uniondale, NY 11553

2. **SERVED BY EMAIL:** Pursuant to F.R.Civ.P. 5 and/or controlling law and rules, on October 8, 2024, I served the following persons and/or entities by electronic mail as follows:

Debtor:
kenny@ezrentacarny.com
isaacbirn@gmail.com

Counsel for Debtor:
rspence@spencelawpc.com

Subchapter V Trustee:
gluckman@forchellilaw.com

I declare under penalty of perjury under the laws of California and, to the extent applicable, the United States that the foregoing is true and correct.

October 8, 2024
Date

Debby Bodkin
Type Name

/s/ Debby Bodkin
Signature